

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

The Applicants have amended claims 22, 28 and 31 to more particularly point out and distinctly claim the subject matter that Applicants regard as the invention; no new matter has been added. Claims 22-36 remain pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **2.) Claim Rejections – 35 U.S.C. §102(b)**

The Examiner has maintained his rejection of claims 22, 23, 25, 26, 28, 30-32, 34 and 35 as being anticipated by Trask (US 5,945,919). The Applicants traverse the rejections.

First, it is to be remembered that anticipation requires that the disclosure of a single piece of prior art reveals every element, or limitation, of a claimed invention. Furthermore, the limitations that must be met by an anticipatory reference are those set forth in each statement of function in a claims limitation, and such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept. **Whereas Trask fails to anticipate each and every limitation of claim 22, that claim is not anticipated thereby.**

The Applicants have amended claim 22 to more particularly point out and distinctly claim the subject matter that Applicants regard as the invention. As described hereinafter, the amendments to claim 22 are not substantive, but are entered to more explicitly distinguish the claim over the teachings of Trask. Claim 22, as amended, recites:

22. A method for enabling one or more of a plurality of location service clients (LSCs) to contact a user of a mobile device, wherein the method comprises the steps of:

selection of at least one authorized LSC type on the mobile device, said at least one authorized LSC type selected from type identifiers associated with said plurality of LSCs;

transmission of one or more type identifiers from the mobile device to a server in a telecommunication system, the one or more type identifiers identifying the selected at least one authorized LSC type;

analysis of the type identifier by said server to determine one or more LSCs associated with the selected type;

determination of at least one address of the one or more LSCs associated with the selected type; and,

sending information from said server to the at least one address of the one or more LSCs associated with the selected type, said information enabling said one or more LSCs to contact said mobile device. (emphasis added)

As previously noted by Applicant, Trask discloses a system for vehicle tracking and dispatch. Specifically, Trask discloses systems related to dispatching a vehicular service to a user of a mobile terminal. In contrast, the Applicants' invention is directed to a system in which a user of a mobile device **can select from a plurality of location-based services** ("location service clients (LSCs)"). The mobile device transmits one or more type identifiers to a server; the type identifiers identify selected ones of the location service clients that are to be authorized to contact the mobile device. The server analyzes the received type identifiers to determine the authorized location service clients and sends information to an address for each such client. The information allows an authorized location service client to contact the mobile device.

Trask does not disclose the use of a "type identifier" and, consequently, does not disclose the steps recited in claim 22 associated with a plurality of type identifiers. The system disclosed by Trask does not need a type identifier because the dispatcher free vehicle allocation (DFVA) system is only used for a single type of service; e.g., a taxi service. Thus, there is no need in the Trask system for multiple type identifiers to differentiate between different authorized services. In other words, **there is no need in Trask to allow a user of a mobile device to "select from a plurality of location-based services," as recited in claim 22.** Therefore, whereas Trask fails to teach each and every limitation of claim 22, that claim is not anticipated.

In rejecting Applicants' prior arguments distinguishing the claimed invention over Trask, the Examiner merely asserted that Applicants' claims are "very clearly

anticipated." The Examiner's *only* substantive response to Applicants, arguments was that: "The claims are in alternative form, hence Trask disclose [sic] at least one type identifiers [sic] and at least one LSC. If applicants claim their invention so broadly, it should not come as a surprise that the examiner examines the claims just as broadly." To the extent the Applicants understand what the Examiner means by saying that the claims "are in alternative form," the Applicants disagree that Trask would anticipate claim 22, either in its prior form or as amended herein.

The Examiner states that Trask discloses "at least one type identifiers [sic] and at least one LSC." By that statement, the Applicants assume that the Examiner is referring to Trask only disclosing a system for vehicle tracking and dispatch and that he is reading "type identifier" and the corresponding location service client onto such a vehicular service. Even under that interpretation, claim 22 did not read on the teachings of Trask because the teachings of Trask do not contemplate enabling more than one type of location service client. Therefore, the method of claim 22 for enabling one or more location service clients (LSCs) to contact a user of a mobile device would not read on Trask because Trask only discloses a single type of service. In any event, to make this distinction more explicit, the Applicants have amended claim 22 to recite:

22. A method for enabling one or more of a plurality of location service clients (LSCs) to contact a user of a mobile device, wherein the method comprises the steps of:

selection of at least one authorized LSC type on the mobile device, said at least one authorized LSC type selected from type identifiers associated with said plurality of LSCs;

transmission of one or more type identifiers from the mobile device to a server in a telecommunication system, the one or more type identifiers identifying the selected at least one authorized LSC type;

analysis of the type identifier by said server to determine one or more LSCs associated with the selected type;

determination of at least one address of the one or more LSCs associated with the selected type; and,

sending information from said server to the at least one address of the one or more LSCs associated with the selected type, said information enabling said one or more LSCs to contact said mobile device. (emphasis added)

The emphasized terminology of claim 22 makes it clear that the Applicants' invention is directed to selectively enabling one or more of a plurality of possible location service clients to contact a user of a mobile device. The identification of authorized LSC types is made by selecting on the mobile device at least one of such plurality of LSCs, the at least one authorized LSC type selected from type identifiers associated with the plurality of LSCs. Those claim limitations are *very clearly* ***not*** anticipated by Trask. Therefore, the Applicants respectfully request that the Examiner withdraw the rejection of claim 22 as anticipated by Trask.

Whereas claims 28 and 31 recite limitations analogous to those of claim 22 from the perspective of the mobile device and server, respectively, those claims are also not anticipated by Trask. Furthermore, whereas claims 23, 25 and 26 are dependent from claim 22; claim 30 is dependent from claim 28; and claims 32, 34 and 35 are dependent from claim 31, and include the limitations of their respective base claims, those claims are also not anticipated by Trask.

### **3.) Claim Rejections – 35 U.S.C. §103(a)**

The Examiner rejected claims 24 and 33 as being unpatentable over Trask in view of Ur (US 6,615,046), and claims 27, 29 and 36 as being unpatentable over Trask in view of Calvert (US 6,526,275). The Applicants traverse the rejections.

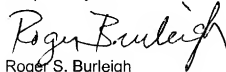
As established *supra*, claims 21, 28 and 31 are not anticipated by Trask. Whereas Ur and Calvert also fail to teach multiple type identifiers to differentiate between different authorized services, they fail to overcome the deficiencies of Trask. Thus, claims 21, 28 and 31 would not be obvious over Trask in view of Ur or Calvert. Therefore, whereas claims 24, 27, 29, 33 and 36 are dependent from claims 21, 28 and 31, and include the limitations thereof, they are not obvious over Trask in view of Ur or Calvert.

**CONCLUSION**

In view of the foregoing amendments and remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 21-36.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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Date: April 7, 2008

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